

REMARKS

Claims 1-17 are the only active claims pending in this application. The claims are amended for form, as indicated on the attached sheets. The amendments do not add new matter. Applicant respectfully requests reconsideration of the application based on the claims and on Applicant's following remarks.

The Office Action rejects claims 1-17 as being anticipated under 35 U.S.C. § 102(b) by United States Patent Publication No. 2003/0003919 (referenced hereinafter as "Beming").

Applicant respectfully traverses the rejection.

All of Applicant's claims define a node provided on a packet switching network side configuring a core network, the node arranged for packet processing, for communication with the packet switching network side, of circuit switching (CS) calls of the mobile communications unit and packet switching PS calls of the mobile communications unit.

Beming discloses *nothing* of that is within the meaning of a node provided on a packet switching network side configuring a core network for communication, with a packet switching network side, of both CS and PS calls of anything, much less of anything within the meaning of packet communication - with the packet switching network side of a core network - of CS calls of a mobile communications unit and PS calls of the mobile communications unit.

Beming discloses relocating a serving radio network controller ("SRNC"), with respect to a plurality of RNCs 26*i*, for hand-off of a mobile user equipment 30.

The RNCs 26*i* connect to either of two separate domains of the Core Network Service Nodes 16, one being the packet switch (PS) domain, the other being the circuit switching (CS) domain.

The PS domain of Beming's Core Network Service Nodes 16 is for connection to the Internet 14. The PS domain consists of the Serving GPRS Support Nodes 20i and the Gateway GPRS Support node.

The CS domain of Beming's Core Network Service Nodes 16 is for connection to the Public Switch Telephone Network/ Integrated Services Digital Network (PSTN/ISDN) 12. The CS domain consists of the mobile switching networks (MSC) 18i.

Respectfully referring to Beming's Figs. 2A and 2B, each of Beming' RNCs 26i has a separate CS and PS connection, the former connecting to the CS domain of the core network services nodes 16, the latter connecting to the PS domain nodes of the core network services nodes 16.

The Examiner takes a position that Beming's "PSTN 12 is connected to MCS nodes 18 that provide circuit switch services," and that this meets the "circuit switch user data processing unit" of claims 1, 5, 8, 9, and 13. Office Action at p. 3.

Applicant respectfully responds that Beming, as it would be understood by a person of ordinary skill in the arts pertaining to the invention, does not support the Examiner's position.

Applicant's claims define the circuit switch user data processing unit being within the node provided on the *packet switching network side* of a core network. Beming's MSC nodes 18 are the CS side of a core network. The CS side of a core network cannot be within the broadest reasonable meaning of the PS side of core network.

The Examiner takes a position that Beming's RNC, since it connects to the CS MSC nodes 18 and the PS SGSN nodes 20, meets the "control unit" element of claims 1, 5, 8, 9, and 13. Office Action at p. 3.

Applicant respectfully responds that Beming, read in its entirety for all information it discloses, as would be understood by a person of ordinary skill in the relevant arts, does not support the Examiner's position.

Applicant submits, in support, that all of Applicant's claims recite the node as being arranged for packet processing, for packet communication with the packet side of the core network of CS and PS calls of the mobile communication unit, and recite the control unit as being within the node.

Beming's RNCs 26 , in contrast, routes CS calls with the mobile unit 30, in CS form, to the MSC nodes 18. Beming's RNCs 26 therefore cannot meet the control unit element of Applicant's claims.

Applicant respectfully urges that, for at least the reasons Applicant submits above, the Examiner reconsider and withdraw the rejection of claims 1-17.

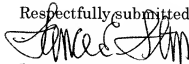
Conclusion

In view of the foregoing, Applicant respectfully requests that the application with claims 1-17 be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is invited to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,



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